

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**FILED**  
8/4/2016

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

**RECEIVED**

JUN 23 2016 AS

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Brandon Carter

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

vs.

Tom Dart, Dena m.

Williams, Sammie Harris

J Mueller

16-cv-6614

C Judge John W. Darrah  
(T Magistrate Judge Susan E. Cox  
PC2

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

**CHECK ONE ONLY:**

☒ **COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983**  
U.S. Code (state, county, or municipal defendants)

☐ **COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE**  
**28 SECTION 1331 U.S. Code (federal defendants)**

☐ **OTHER (cite statute, if known)**

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR**  
**FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

**I. Plaintiff(s):**

- A. Name: Brandon Carter
- B. List all aliases: Jacquese Carter, Gregory Green
- C. Prisoner identification number: 0537243/20120921208
- D. Place of present confinement: Cook County Department of Corrections
- E. Address: P.O. Box ~~0000~~ 089007

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Tom Dart  
 Title: Cook County ~~Department of Corrections~~ Sheriff  
 Place of Employment: Cook County Department of Corrections
- B. Defendant: Dena M. Williams  
 Title: DOC Administration  
 Place of Employment: Cook County Department of Corrections
- C. Defendant: Samone Harris  
 Title: DOC Administration  
 Place of Employment: Cook County Department of Corrections

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: N/A
- B. Approximate date of filing lawsuit: N/A
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: N/A
- D. List all defendants: N/A
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): N/A
- F. Name of judge to whom case was assigned: N/A
- G. Basic claim made: N/A
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): N/A
- I. Approximate date of disposition: N/A

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**



Defendant: J. Mueller

Title: Doc Administration

Place Of Employment: Cook County Department of Corrections



#### IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

Issue 1, claim 1

I am a Hebrew-Israelite and I have been requesting to receive my Kosher food tray every since I've been incarcerated at the Cook County Department of Corrections. I have talked to several staff members regarding this matter and filed a large amount of grievances as well. In particular I filed a grievance on 2-9-2016 in which I explained my rights as a Hebrew-Israelite and that I am entitled to a Kosher diet because I am suppose to eat food that is sealed and blessed in which it regards to our Passover. I am not supposed to eat any animal products unless it is sealed and blessed as I stated above. I was seen by A Rabbi named Scherman who presented me a religious diet form that I signed and explained my religious food diet needs for my Kosher tray. Rabbi Scherman said that the Cook County Department of Corrections were going to change it in the computer to Kosher because I am entitled to Kosher food. My grievance was responded to by Samana Harris who placed an attachment to the grievance stating these words and I quote "You recently requested to reserve a Kosher diet. Your religious preference is documented as Hebrew-Israelite. The vegan meal is the designated meal for individuals detained who are of the Hebrew-Israelite faith. The meal meets all religious and legal standards". Now I am not receiving my Kosher diet I am currently receiving a vegan diet and it is not anything like a Kosher diet and it is not the right diet for a Hebrew-Israelite. There is another detainee that is a Hebrew-Israelite and he receive

Revised 9/2007

a Kosher food diet his Last name is Payne and he is located in the Cook County Department of Corrections on Division 7 RTU, I think his first name is Donnell these are all facts and I am not getting my proper food that I am supposed to receive as a Hebrew Israelite. This is violating my right to not only practice my religious food diet but also denying me an equal opportunity right as an Hebrew-Israelite, thank you very much.

Issue 2, and claim 2.

I filed a grievance on 4-1-2016 because throughout my stay here I have informed Cook County DOC employees, Correctional officers, Deputies Sgts LTs, commanders, superintendents and religious services of my status and my religious beliefs through request slips, Grievances and Social workers. The entire time that I have been incarcerated in the Cook County Department of Corrections I have been denied the right to practice my faith as an Hebrew-Israelite. I have been denied the right to practice and/or participate in my religious belief do to Cook County Department of Corrections religious services employees telling me to prove myself and my religion. When an inmate say they are any form of Christianity they do not have to prove their religion. They do not have to contact their religious leader and go through any extra situations just so that they can practice their faith. The same is done for those of the Islamic faith, Jewish faith as well. As pre-trial detainees here at the Cook County Department of Corrections the Islamic services don't make the muslims contact their Imam or their mosque. The Rabbi doesn't have to be notified when it come to those who worship the Jewish Faith. All of the above are 5 different religious faiths that have their religious services held here and practice here at the Cook County Department of Corrections, based on what the Detainees write to religious services of the Cook County Department of Corrections. Revised 9/2007



Each one of these services celebrate a festival honor, father passover, mass, communion and Ramadan. To this I have written religious services explaining my desire to practice and worship my religion as well. I did <sup>not</sup> receive any response to my requests therefore I wrote the grievance on 4-1-2016 the grievance number is 2016 X2906. The response that I received from the grievance was very cruel and unusual and Ms. Dena M. Williams and J. Mueller signed the response. I would like to be allowed to practice and participate in my religious belief like everyone else.



**V. Relief:**

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes. Issue 1, Claim 1, I request that the Court grant me compensatory and punitive damages in the amount of \$100,000. I also request to receive pain and suffering in the amount of \$100,000.

Issue 2, Claim 2, I request the court to grant me compensatory and punitive damages in the amount of \$200,000 and I also request to receive pain and suffering in the amount of \$200,000 and I ask the court to hold all parties involved accountable for their actions, and any other compensation the court deems fair and just.

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

**CERTIFICATION**

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this May day of 25, 2016

Brandon Carter

(Signature of plaintiff or plaintiffs)

Brandon Carter

(Print name)

20120921208

(I.D. Number)

2917 Nth 23rd Street

Milwaukee, Wisconsin 53206

(Address)



Brandon Carter #20120921208  
Cook County Jail  
P.O. Box 089002  
Chicago, Illinois 60608



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United States District Court  
Prisoner Correspondence  
Northern District of Illinois  
219 South Dearborn Street  
Chicago, Illinois 60604

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16-cv-6614  
Judge John W. Darrah  
Magistrate Judge Susan E. Cox  
PC2



